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*Attorneys for Defendants Wells Fargo Bank, N.A.,  
 Katherine Darrall, and Jose Rico*

**IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

MAURICIO JASSO, individually and in his  
 capacity as the Court-Appointed Receiver of  
 JAMA INVESTMENT GROUP, INC.,  
 GUILLERMO SESMA, SYLVIA MARTINEZ  
 SALINAS, BELISARIO JASSO BALDINI,  
 JAVIER RAMIREZ LARES, ANTONIO  
 BACHALANI, RODRIGO FERNANDEZ,  
 JUAN ROMERO, and BERNARDO  
 VILLACECIAS,

Plaintiffs,

v.

WELLS FARGO BANK, N.A., KATHERINE  
 DARRALL, and JOSE RICO,

Defendants.

Case No. 2:20-cv-00858-RFB-BNW

**STIPULATION AND ORDER FOR  
 EXTENSION TO RESPOND TO  
 PLAINTIFFS' MOTION TO SEAL  
 EXHIBIT TO PLAINTIFF'S FOURTH  
 MOTION TO COMPEL WELLS FARGO  
 BANK, N.A. TO PRODUCE  
 DOCUMENTS AND ADD CUSTODIANS  
 [ECF NO. 71]**

**(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs Mauricio Jasso ("Jasso"), individually and in his capacity as the court-appointed receiver of JAMA Investment Group, Inc. ("JAMA"), Guillermo Sesma ("Sesma"), Sylvia Martinez Salinas ("Salinas"), Belisario Jasso Baldini ("Baldini"), Javier Ramirez Lares ("Lares"), Antonio Bachalani ("Bachalani"), Rodrigo Fernandez ("Fernandez"), Juan Romero ("Romero"), and Bernardo Villacecias ("Villacecias") (collectively, "Plaintiffs"), and Defendants Wells Fargo Bank, N.A. ("Wells Fargo"), Katherine Darrall ("Darrall"), and Jose Rico ("Rico") (collectively, "Defendants")

and together with Plaintiffs, the “Parties”) by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Wells Fargo’s deadline to file its Response to Plaintiffs’ Motion to Seal Exhibit to Plaintiffs’ Fourth Motion to Compel Wells Fargo Bank, N.A. to Produce Documents and Add Custodians [ECF No. 71] (the “Motion to Seal”) by two days, from Wednesday, August 11, 2021, to Friday, August 13, 2021 for the following reasons:

1. Plaintiffs filed the Motion to Seal on July 28, 2021 [ECF No. 71] in relation to their Fourth Motion to Compel Wells Fargo to Produce Documents and Add Custodians [ECF No. 70] (the “Motion to Compel”).

2. Wells Fargo’s Response to the Motion to Seal [ECF No. 71] is currently due on August 11, 2021.

3. A hearing on the Motion to Seal [ECF No. 71], as well as the related Motion to Compel [ECF No. 70], is currently set for September 21, 2021 before the Honorable Magistrate Judge Brenda Weksler, as stated in the Court’s July 29, 2021 Minute Order [ECF No. 74].

4. Wells Fargo asserts that there is good cause for two additional days to file its Response to allow for input from key individuals who have been or are currently out of the office.

5. Wells Fargo also requests this brief extension to analyze and respond to Plaintiffs’ Motion to Seal to ensure that the issues raised in the Motion to Seal are sufficiently addressed. This additional basis also qualifies as good cause for this short extension.

6. No prejudice will result due to a 2-day extension, considering the hearing is not scheduled until September 21, 2021.

This extension request is sought in good faith and is not made for the purpose of delay.

THEREFORE, for good cause shown, the Parties respectfully request an extension for Wells Fargo its Response to the Motion to Seal [ECF No. 71] from August 11, 2021, to and including August 13, 2021.

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 law offices  
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DATED this 9th day of August, 2021.

SNELL & WILMER L.L.P.

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*Attorneys for Wells Fargo Bank, N.A.,  
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DATED this 9th day of August, 2021.

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*Attorneys for Plaintiffs*

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

August 10, 2021  
 DATED: \_\_\_\_\_